

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RAMON JIMENEZ,

Plaintiff,

CASE NO.: 2:18-CV-01003-GEKP

vs.

BEST BEHAVIORAL HEALTHCARE,
INC.; and AMARILIS LAFONTAINE,
Individually,

Defendants.

_____ /

AFFIDAVIT FOR REASONABLE ATTORNEYS' FEES

FLORIDA)

BROWARD COUNTY)

BEFORE ME, an officer duly authorized to take oaths and administer acknowledgments,
appeared ANGELI MURTHY, who, after being duly sworn, did depose and state:

1. My name is ANGELI MURTHY. I am a shareholder at the law firm of Morgan & Morgan, P.A. (Morgan & Morgan). I am lead counsel in this matter, and handled the litigation in its entirety, from inception to conclusion. I will also handle the appeal Defendants have filed.

2. The contemporaneous time records prepared by Morgan & Morgan with respect to this case are attached hereto as **Attachment 1**. I have reviewed the fee records and have removed or reduced, as appropriate, entries which in my billing judgment were unnecessary, redundant or clerical. I aver that the hours set forth to be recovered were necessary in achieving the relief we were able to secure for Mr. Jimenez in this matter, which constituted 100% of the wages he sought.

3. I am a 2004 graduate of Georgetown University Law Center. While at Georgetown, I was a Senior Articles Editor for the Georgetown Immigration Law Journal. I have been practicing law since 2004, and am admitted to practice in both Pennsylvania and Florida. I am a member in good standing admitted to practice before the Supreme Court of the United States, the Courts of Appeals for the Third, Fourth and Eleventh Circuits, as well as the Southern, Middle, and Northern Districts of Florida, the Middle and Eastern Districts of Pennsylvania, the Eastern and Western Districts of Michigan, the Western District of Tennessee, the District of Idaho, and the District of Colorado. Since 2006, I have devoted my practice exclusively to matters involving claims arising under state and federal employment discrimination statutes, and the Fair Labor Standards Act (“FLSA”).

4. I have also spoken at continuing legal education seminars in Florida and California on topics pertaining to the FLSA, including on topics pertaining to independent contractor misclassification. I am currently the co-chair of the Wage and Hour Administration Subcommittee of the Labor and Employment Section of the Florida Bar.


5. From 2006 through 2011, I was an associate in the Labor and Employment Practice Group of Morgan, Lewis & Bockius LLP (“Morgan Lewis”), in both Philadelphia (2006 – 2010), and Miami (2010 – 2011), focusing exclusively on employment litigation. In my final year as an associate at Morgan Lewis (2011), my regular billing rate was well over \$400.00 per hour. During my tenure with Morgan Lewis, I regularly represented Fortune 100 companies in employment discrimination and FLSA individual, collective, and class actions.

6. In December 2011, I began representing employees in discrimination and wage claims in the National Employee Rights Group at Morgan & Morgan.

7. When I began working at Morgan & Morgan in December 2011, I initially billed my clients at a rate of \$350.00 per hour for my services. In January 2015 my rate increased to \$425.00 per hour. I have been engaged directly by clients, as well as by other attorneys who seek my services as local counsel, at a rate of \$425 per hour within the past two years.

8. I was recently awarded a rate of \$425 per hour following a federal jury trial in an independent contractor misclassification matter. *Pena v. RDI, LLC*, No. 8:17-CV-01404-T-AAS, 2019 WL 3017574, at *1 (M.D. Fla. July 10, 2019). I was also awarded a rate of \$455 per hour by the Eastern District of Virginia in a case involving failure to pay earned wages due under a contract, in a decision affirmed at the Fourth Circuit. *Rishell v. Computer Scis. Corp.*, No. 1:13-cv-0931-CMH-TCB, at D.E. 290 (E.D. Va. Sept. 2, 2016), *aff'd Rishell v. Computer Scis. Corp.*, 702 F. App'x 103 (4th Cir. June 28, 2017).

9. This Affidavit is offered in support of the rate and time I expended in this matter, to demonstrate that same are reasonable.


ANGELI MURTHY, ESQUIRE

STATE OF FLORIDA

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SS:

COUNTY OF BROWARD

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SWORN TO AND SUBSCRIBED before me this 14th day of August 2019, by ANGELI MURTHY [✓] who is personally known to me or who produced _____ as identification, and who acknowledged before me ~~me~~ that she executed the same.



Beatriz E. Reyes
COMMISSION # GG260251
EXPIRES: Sept. 19, 2022
Bonded Thru Aaron Notary

NOTARY PUBLIC, STATE OF FLORIDA

BEATRIZ E. PEYES
Print or Type Name of Notary